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## Flathead Basin Commission

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May 5, 2014

Docket Coordinator, Headquarters U.S. Environmental Protection Agency CERCLA Docket Office (Mail Code – 5350T) 1200 Pennsylvania Avenue, NW Washington, DC 20460

Re: Columbia Falls Aluminum Company (CFAC) Site Remediation Dear Docket Coordinator:

The Flathead Basin Commission (FBC) was created in 1983 by the Montana legislature to protect the water quality, natural resources and economic well-being of the Flathead watershed. The 23-member commission represents a broad cross-section of citizens, local, state, tribal, federal and provincial agencies. Given the mission of the FBC, the remediation of the CFAC property is of concern to our organization.

As you know, based on the preliminary site assessment undertaken by the EPA, the pollution present at the CFAC site renders it eligible for the National Priority List (NPL). The benefits of NPL listing include greater availability of funding for site assessment and remediation, and the threat of treble damages in the event that the Primary Responsible Parties (PRPs) refuse to contribute to clean-up efforts.

The City of Columbia Falls, and its residents, have overwhelmingly agreed that site remediation is of the highest importance. The potentially adverse impacts to human health and environmental quality, due to the current levels of contamination in surface waters, groundwater and soils, pose a significant risk to the community. In addition, economic development opportunities that will accrue to the community and the State can best be achieved by undertaking comprehensive remediation efforts. NPL listing would guarantee remediation, whether or not the PRPs opt to voluntarily cooperate. Therefore, the FBC unequivocally supports the NPL listing, and urges EPA to designate the site as such.